

1 Anthony J. Orshansky, Cal. Bar No. 199364  
2 anthony@counselonegroup.com  
3 COUNSELONE, PC  
4 9301 Wilshire Blvd., Suite 650  
Beverly Hills, California 90210  
Telephone: (310) 277-9945  
Facsimile: (424) 277-3727

5 Attorneys for Plaintiff  
6 KELLY ROMERO, on behalf of herself  
and others similarly situated

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

1 COMES NOW Plaintiff Kelly Romero (“Plaintiff”) and Defendant Flowers Bakeries,  
2 LLC, dba Nature’s Own (“Defendant”), by and through their respective counsel, to hereby  
3 stipulate to continue the deadlines for Plaintiff to file her Opposition to Defendant’s Motion to  
4 Dismiss or Stay Pursuant to Rule 12(b)(1) and 12(b)(6) (the “Motion to Dismiss”) and  
5 Defendant’s Reply to Plaintiff’s Opposition.

6 WHEREAS, Defendant filed a Motion to Dismiss Plaintiff’s Complaint on January 2,  
7 2015;

8 WHEREAS, Plaintiff’s Opposition to Defendant’s Motion to Dismiss is due to be filed by  
9 January 16, 2015;

10 WHEREAS, Defendant’s Reply to Plaintiff’s Opposition is due to be filed by January 23,  
11 2015;

12 WHEREAS, the hearing on the Motion to Dismiss currently is scheduled for April 16,  
13 2015;

14 WHEREAS, the parties have stipulated to enlarge the time to file the Opposition and Reply  
15 briefs;

16 WHEREAS, no previous modifications have been requested regarding this matter;

17 WHEREAS, the parties request that the Court grant short extensions of time to file the  
18 Opposition and Reply to Defendant’s Motion to Dismiss;

19 WHEREAS, the requested extensions do not require the Court to continue the date of  
20 hearing, which is set for April 16, 2015;

21 WHEREAS, there is good cause for enlarging the time to file the Opposition and Reply  
22 briefs because additional time is required to allow counsel to prepare papers that adequately  
23 represent their respective clients’ interests, as well as because the parties are meeting and  
24 conferring regarding the Complaint and the Motion to Dismiss;

25 NOW, THEREFORE, it is hereby stipulated by the parties, through their respective  
26 counsel of record, that the date by which Plaintiff must file her Opposition to Defendant’s Motion  
27 to Dismiss shall be continued for three weeks, from January 16, 2015 through and including

1 February 6, 2015, and the time in which Defendant must file its Reply to Plaintiff's Opposition  
2 shall be extended from one week to two weeks following the filing of Plaintiff's Opposition, from  
3 February 13, 2015 through and including February 20, 2015.

4 **IT IS SO STIPULATED.**

5  
6 Dated: January 9, 2015

Dated: January 9, 2015

7 COUNSELONE, PC

8 CROWELL & MORING LLP

9 /s/ Anthony J. Orshansky

10 Anthony J. Orshansky

11 Attorney for Plaintiff

KELLY ROMERO

/s/ Joel D. Smith

Jennifer S. Romano

Joel D. Smith

Attorneys for Defendant

FLOWERS BAKERIES, LLC dba

NATURE'S OWN

13 Anthony J. Orshansky attests that Joel D. Smith has consented to the filing of this  
14 document.

15 /s/ Anthony J. Orshansky

16 Anthony J. Orshansky

17 **[PROPOSED] ORDER**

18 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

19  
20 DATED: \_\_\_\_\_

By: \_\_\_\_\_

21 Beth Labson Freeman  
22 United States District Judge